

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

**JESUS R. SANCHEZ, on behalf of himself  
and all others similarly situated,**

Plaintiff,

vs.

**VERIFIED PERSON, INC., et al,**

Defendants.

CASE NO. 2:11-cv-02548

DISTRICT JUDGE S. THOMAS  
ANDERSON

MAGISTRATE JUDGE CHARMIANE  
G. CLAXTON

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**DEFENDANT VERIFIED PERSON, INC.’S UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S MOTION TO RECONSIDER**

Defendant, Verified Person, Inc. (“VPI”), respectfully submits this Unopposed Motion for An Extension of Time to Respond to Plaintiff’s Motion to Reconsider and to Set a Status Conference. In support of this Motion, VPI states, as follows:

1. Plaintiff filed a Motion to Reconsider and To Set a Status Conference (“Plaintiff’s Motion”) on June 18, 2012 (Docket Entry, “D.E.” 62).
2. Plaintiff’s Motion includes a request by the Parties for a status conference with the Court, prior to the Court ruling on Plaintiff’s Motion or any matter presently before the Court. (See D.E. 62 at p. 3).
3. Plaintiff’s Motion also asks the Court to permit VPI an appropriate enlargement of time for its response in order to permit the requested status conference to take place. (See D.E. 62 at p. 3).
4. Accordingly, VPI requests an extension of time to respond to Plaintiff’s Motion, until 21 days after the date that the Court holds a status conference in this matter.

5. In accordance with Local Rule 7.2, the undersigned counsel has consulted with counsel for Plaintiff, via email, on June 19, 2012. Plaintiff's Counsel does not oppose the request for an extension of time set forth in this Motion. A Certification of Counsel is attached hereto.

WHEREFORE, for the foregoing reasons, VPI respectfully requests entry of an Order allowing VPI until 21 days after the date that the Court holds a status conference in this matter, for VPI to respond to Plaintiff's Motion to Reconsider.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER  
COLEMAN & GOGGIN**

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Attorneys for Defendant,  
Verified Person, Inc.

**CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 7.2**

Pursuant to Local Rule 7.2, the undersigned Counsel for Defendant, Verified Person, Inc., consulted with Counsel for Plaintiff, Leonard A. Bennett, Esq., via email on June 19, 2012. Counsel for Plaintiff does not oppose the request for an extension of time in the foregoing Motion.

**MARSHALL, DENNEHEY, WARNER  
COLEMAN & GOGGIN**

By: /s/ Eric A. Packel  
ERIC A. PACKEL, ESQUIRE  
Attorney for Defendant, Verified Person, Inc.  
(Admitted *pro hac vice*)

**CERTIFICATE OF SERVICE**

I certify that on June 19, 2012, I electronically filed the foregoing Motion for An Extension of Time to Respond to Plaintiff's Motion to Reconsider with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

**MARSHALL, DENNEHEY, WARNER  
COLEMAN & GOGGIN**

By: /s/ Eric A. Packel  
ERIC A. PACKEL, ESQUIRE  
Attorney for Defendant, Verified Person, Inc.  
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